

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Bayong Brown Bayong and
Ahmed Adem

:

:

Case No. 1:20-cv-00989

Plaintiffs,

:

Judge Jeffery P. Hopkins

Magistrate Judge Stephanie K. Bowman

v.

:

County of Butler, Ohio, *et al.*

:

:

Defendants.

DECLARATION OF NICHOLAS FISHER

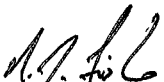
1. I am a Captain at the Butler County Sheriff's Office and serve as the Warden, or Jail Administrator, of the Butler County Jail.
2. I was the Warden of the Butler County Jail in 2020 while Bayong Brown Bayong and Ahmed Adem were detainees.
3. The Butler County Jail implemented additional protocols, starting in March 2020, to address the COVID-19 pandemic, including, but not limited to, medical isolation or quarantine of symptomatic detainees and detainees suspected of having been in close contact with a COVID-19 individual.
4. The attached Exhibit 1 is a true and accurate copy of the use of force review file concerning the July 21, 2020 incident between Mr. Adem and Corrections Officers Phipps and Washburn.
5. The attached Exhibit 2 is a true and accurate copy of the jail incident report documenting Mr. Bayong's August 17, 2020 transfer to the jail's F-pod.
6. The attached Exhibit 3 is a true and accurate copy of the use of force review file concerning the October 20, 2020 incident between Mr. Bayong and Corrections Officers Roberts and Bartlett.
7. The attached Exhibit 4 is a true and accurate copy of the use of force review file concerning the October 20, 2020 incident between Mr. Adem and Corrections Officer Blanton.

8. The attached Exhibit 5 is a true and accurate copy of the September 1, 2021 letter I received from State Jail Inspector Klinton Hill with the Ohio Department of Rehabilitation & Correction, Bureau of Adult Detention.
9. The attached Exhibit 6 is a true and accurate copy of the November 2020 Butler County Sheriff's Office investigation file concerning the civil rights allegations by Mr. Bayong and Mr. Adem.
10. The attached Exhibit 7 is a true and accurate copy of the officer statements obtained during the internal investigation interviews conducted in the November 2020 Butler County Sheriff's Office investigation into the civil rights allegations by Mr. Bayong and Mr. Adem.
11. The attached Exhibits 1-7 have been created, maintained, and/or collected in the ordinary course of business at the Butler County Jail.
12. Corrections officers employed at the Butler County Jail receive a complete copy of the Butler County Sheriff's Office Policies and Procedures that the corrections officers must review and understand.
13. Corrections officers employed at the Butler County Jail receive a complete copy of the Butler County Sheriff's Office Corrections Division Post Orders that the corrections officers must review and understand.
14. Corrections officers employed at the Butler County Jail receive monthly training on the jail's post orders.
15. There are written tests associated with the jail's post orders that corrections officers employed at the Butler County Jail must pass.
16. Corrections officers employed at the Butler County Jail are required to complete annual training on use of force.
17. All new corrections officers employed at the Butler County Jail are required to complete a Field Training Officer program at the jail to ensure competency as to all requisite jail duties.
18. The Butler County Sheriff's Office employs a training officer to ensure that all corrections officers employed at the Butler County Jail are up to date on the training requirements.
19. The Butler County Sheriff's Office requires all corrections officers to complete the Ohio Peace Officer Training Academy, Basic Corrections Officer Training within one year of hire.
20. Staffing at the Butler County Jail, in 2020, required that three or more supervisors were on duty at the jail per shift.
21. Corrections officers at the Butler County Jail receive performance evaluations.

22. The Butler County Sheriff's Office takes allegations of corrections officer misconduct at the Butler County Jail very seriously.

23. I declare under penalty of perjury the foregoing is true and correct.

Executed on: April 12, 2023



Nicholas Fisher